

ALLEN & OVERY LLP
John Roberti (*pro hac vice*)
Andrew Rhys Davies (*pro hac vice*)
1221 Avenue of the Americas
New York, NY 10020
Telephone: (212) 610-6300
Facsimile: (212) 610-6399
Email: john.roberti@allenovery.com
andrewrhys.davies@allenovery.com

Attorneys for Defendant Samsung SDI America, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Case No.: 4:20-cv-05606-JST

Master File No.: 4:07-cv-05944-JST

MDL No. 1917

This document relates to:

Government of Puerto Rico, et al.,

Plaintiff,

v.

Panasonic Corp. of North America, et al.,

Defendants.

**DECLARATION OF ANDREW RHYS
DAVIES IN SUPPORT OF SAMSUNG SDI
AMERICA, INC.'S MOTION TO DISMISS
FOR INSUFFICIENT SERVICE OF
PROCESS**

Date: August 19, 2021

Time: 2:00 p.m.

Judge: Hon. Jon S. Tigar

Courtroom: 6, 2 Floor

1 I, Andrew Rhys Davies, declare:

2 1. I am an attorney licensed to practice in the State of New York and admitted pro
3 hac vice for the purposes of this lawsuit, ECF No. 5251, and I am a member of Allen & Overy
4 LLP, counsel to Samsung SDI America, Inc. ("SDIA").

5 2. I make this declaration in support of SDIA's Motion to Dismiss for Insufficient
6 Service of Process. The matters set forth herein are within my personal knowledge and if called
7 up on and sworn as a witness I could competently testify regarding them.

8 3. Following the March 3, 2021 show cause hearing in this matter, counsel for a co-
9 defendant communicated with Plaintiff's counsel with a view to complying with the Court's
10 order to submit a stipulation by March 10, 2021 identifying the unserved defendants that should
11 be dismissed.

12 4. On March 9, 2021, Plaintiff's counsel refused to include SDIA on the list, on the
13 basis that Plaintiff claims to have served SDIA. It was only at that point that Plaintiff's counsel
14 produced a proof of service, which they still have not filed. It is attached as Exhibit A.

15 5. Attached hereto as Exhibit A is a true and correct copy of the proof of service I
16 received via counsel for a co-defendant on March 9, 2021.

17 I declare under penalty of perjury that the foregoing is true and correct. Executed this
18 5th day of May, 2021.

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20 /s/ Andrew Rhys Davies
21 Andrew Rhys Davies
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EXHIBIT A

Attorney or Party without Attorney: DENISE MALDONADO-ROSA, Assistant Attorney General (Sole Registry of Attorneys: 15652) GIRARDI & KEESE 1126 Wilshire Blvd., Los Angeles, CA 90017 Telephone No: 213-262-6777 Attorney For: Plaintiff				For Court Use Only	
Ref. No. or File No.:					
Insert name of Court, and Judicial District and Branch Court: COMMONWEALTH OF PUERTO RICO COURT OF FIRST INSTANCE SUPERIOR COURT OF SAN JUAN					
Plaintiff: GOVERNMENT OF PUERTO RICO, THROUGH ITS ATTORNEY GENERAL OF JUSTICE OF PUERTO RICO WANDA VAZQUEZ Defendant: LG ELECTRONICS, INC., LG ELECTRONICS USA, INC., LC ELECTRONICS TAIWAN TAIPEI CO., et al.					
PROOF OF SERVICE		Hearing Date:	Time:	Dept/Div:	Case Number: SJ2018CV10831

1. At the time of service I was at least 18 years of age and not a party to this action.

2. I served copies of the Summons; Complaint; Emplazamiento

3. a. Party served: SAMSUNG SDI AMERICA, INC.

b. Person served: DEVIN JONES, EMPLOYEE

4. Address where the party was served: 4121 N. Atlantic Blvd., Auburn Hills, MI 48326

5. I served the party:

a. by substituted service. On: Wed, Sep 02 2020 at: 01:35 PM by leaving the copies with or in the presence of:
 DEVIN JONES, EMPLOYEE

(1) A Person in charge at least 18 years of age apparently in charge of the office or usual place of business of the person served. I informed him or her of the general nature of the papers.

(2) A declaration of mailing is attached.

Recoverable cost Per CCP 1033.5(a)(4)(B)

6. Person Who Served Papers:

a. Tristan Seave

b. FIRST LEGAL

1517 W. Beverly Blvd.

LOS ANGELES, CA 90026

c. (213) 250-1111

d. The Fee for Service was: \$360.90

e. I am: Not A Registered California Process Server

7. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

09/08/2020

(Date)

Tristan Seave
 (Signature)



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